

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No.: 3:15-CR-00136-WMC

ANTHONY T. JOHNSON,

Defendant.

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**MOTION TO DISCLOSE USE OF “PEN REGISTER”,  
“TRAP AND TRACE,” OR SIMILAR DEVICE**

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ANTHONY T. JOHNSON, above named defendant, by his attorneys, MAYS LAW OFFICE, LLC., pursuant to Rule 12, FED.R.CRIM.P., and, upon all of the files, records and proceedings heretofore had herein, respectfully moves this Court for the entry of an Order requiring the government to disclose to the defendant whether or not law enforcement agents, with or without Court authorization, employed a “pen register,” “trap and trace,” or similar device to monitor telephone calls made by the defendant, and the results of the use of any such device, upon the following grounds:


1. Disclosure is necessary for the defendant to determine whether grounds exist for a motion to suppress pertaining to use of a “pen register,” “trap and trace,” or similar device to monitor telephone calls.
2. Disclosure is necessary to avoid surprise at trial.

Dated at Middleton, Wisconsin, this 4<sup>th</sup> day of December, 2015.

Respectfully submitted,  
ANTHONY T. JOHNSON, Defendant

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